IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

WISCONSIN ALUMNI RESEARCH FOUNDATION,)))
Plaintiff,) Case No. 3:14-cv-00062-wmc
v.)
APPLE, INC.,)
Defendant.))

WARF'S REPLY BRIEF IN SUPPORT OF MOTION TO PRECLUDE TESTIMONY FROM APPLE'S EMPLOYEE-WITNESS GERARD WILLIAMS III

WARF believes that Apple has not accurately stated the ruling of Judge Crocker on WARF's Motion to Compel access to the cSim simulator. When counsel for WARF expressed concern that Apple would later attempt to raise at trial issues on which WARF had been prevented from discovering evidence, the Court explained:

THE COURT: Let me stop you there. Let me stop you there. I want to make it clear to both sides that the Court would never allow that to happen. If the Court does not allow discovery on a particular product or particular line of questioning or interrogatories or requests for production of documents, that's a two-way street. Nobody uses it. So you don't have to worry about being sandbagged. So set that aside. But I interrupted you again.

Dkt. 72, Hearing Tr. at 24:6-14. Apple did not produce CSIM or reproduce the records that allow WARF to test Mr. Williams recollection.

Respectfully submitted,

Dated: October 14, 2015

By: /s/Jennifer L. Gregor

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